



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

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(Red)

AUG 17 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW11

Mr. Michael C. Veysey
Assistant General Counsel
Gould Inc.
10 Gould Center
Rolling Meadows, Illinois 60008

Re: Gould Inc., Metals Division, Marjol Operation
PAD 00 304 1910

Dear Mr. Veysey:

Pursuant to the provisions of the Resource Conservation and Recovery Act, 42 U.S.C. §§ 6901 et seq., (the Act), the Administrator of the U.S. Environmental Protection Agency (EPA) authorized the Commonwealth of Pennsylvania to carry out a hazardous waste program. The Pennsylvania regulations, 25 PA Code Chapter 75, through this authorization became requirements of the EPA program of Subtitle C of the Act.

In order to determine the status of Gould Inc., Metals Division, Marjol Operation (Marjol), located in Throop, Pennsylvania, we hereby request, pursuant to Section 3007 of the Act, 42 U.S.C. § 6927, that you furnish to EPA, within 14 calendar days of receipt of this letter the following information:

1. Identify all solid wastes generated by the above-referenced facility since November 19, 1980.
2. Provide copies of the hazardous waste determinations made concerning the solid wastes, described in response to paragraph 1, as required by 25 PA Code § 75.262(b). If copies are not available, provide a description of the hazardous waste determinations made for those solid wastes for which copies are not available. This should include the EPA waste codes and/or characteristics for each waste.

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3. Describe the methods of on-site and off-site treatment, storage and disposal for each solid waste identified in response to paragraph 1.
4. Provide the following information for the approximately 4000 tons of lead contaminated waste which was stored at Marjol in the early 1980s:
 - a) The information required in paragraphs 1 through 3, above.
 - b) The timeframe during which this lead contaminated waste was stored at Marjol.
 - c) Copies of manifests pertaining to shipments of the lead contaminated waste for off-site treatment, storage and disposal.
 - d) A description of any closure activities performed in relation to the lead contaminated waste. This should include copies of any related documents, such as closure plans, analytical data and applicable correspondence between Marjol and Pennsylvania's Department of Environmental Resources.
 - e) A description of the present status of the lead contaminated waste pile at Marjol.

Failure to provide information requested pursuant to Section 3007 of the Act constitutes a violation of the Act. Section 3008 of the Act, 42 U.S.C. § 6928, provides EPA with the authority to apply administrative, civil, and criminal sanctions for violations of the Act.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a business or businesses' claim is asserted and substantiated at the time requested information is submitted, EPA may make this information available to the public without further notice to you.

Please send the request information to:

U.S. Environmental Protection Agency
Region III
841 Chestnut Street Building
Philadelphia, PA 19107
ATTN: William L. Walsh (3HW11)

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If you have any questions concerning this matter, please
contact Mr. William L. Walsh at (215) 597-1192.

Sincerely,

Neil R. Swanson

Bruce P. Smith, Chief

for Hazardous Waste Enforcement Branch

cc: David J. Lamereaux
Regional Solid Waste Manager